

Norman Rehn
1 Anchor Way
Newbury, MA 01951-1202

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Ms. Kathleen Baskin, P.E.
Director of Water Policy and Planning
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, 9th floor
Boston, MA

My Comments on the SWMI Framework

Dear Ms. Baskin,

The SWMI Framework is flawed in several areas and these flaws significantly affect the Parker River watershed, which is already a highly stressed river due to existing water withdrawals.

EEA's "safe yield" figure for the Parker River is based on a formula that includes approximately 19 square miles of salt marsh and barrier beach in the 81.79 square mile drainage area. This skews the figure (makes it higher) by about 23%. None of this 19 square mile area could actually be used for fresh water withdrawals – it is well known locally that before fresh water was provided to Plum Island by the Plum Island water/sewer project, island residents were only able to extract brackish water from their wells.

There is nothing in the SWMI Framework which would prevent all of the presently unallocated "safe yield" capacity from being allocated to areas where existing withdrawals are already being made. The upper reaches of the Parker River, starting in the vicinity of the Georgetown Water Department wells, has already had no flow conditions several times. To say that an additional 12.5 mgd could be withdrawn there AND adequately protect the environment is ludicrous.

I urge you to reject the EEA SWMI Framework because it contains these and other flaws.

Sincerely,



Norman Rehn

cc:

Governor Deval Patrick
Secretary Richard Sullivan

Assistant Secretary Philip Griffiths
Commissioner Ken Kimmell
Commissioner Mary Griffin
Commissioner Edward Lambert
State Senator Bruce Tarr
State Representative Mike Costello
State Representative Harriett Stanley
Mass. Rivers Alliance
Conservation Law Foundation